

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
EL PASO DIVISION

JESUS PARRA,
Plaintiff,

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v.

FEDEX FREIGHT SERVICES, INC.,
a/k/a FEDEX CORPORATE SERVICES,
INC., a/k/a FEDEX CORPORATION,
Defendant.

CIVIL ACTION NO: 3:14-CV-00459-FM

AFFIDAVIT OF WILLIAM MCCULLOUGH

STATE OF TEXAS §

COUNTY OF TRAVIS §

Before me the undersigned notary, on this day personally appeared William McCullough, a person whose identity is known to me. After I administered an oath to him, upon his oath he stated:

1. My name is William McCullough. I am over the age of eighteen and am fully capable and competent of making this affidavit. The facts stated in this affidavit are within my personal knowledge and are true and correct.
2. I have been employed with FedEx Freight, Inc. (or one of its predecessor companies) since July 1, 1997. From July 1, 2001 to present, I worked as the Austin Service Center Manager. In that role, I serve as the head of the FedEx Austin operations located at 2500 Chisolm Trail, Round Rock, Texas, 78681. I was one of Jesus Parra's supervisors while he was employed with FedEx Freight, Inc. in the Austin area. I live in Austin, Texas.
3. Parra was hired on December 21, 2004 at the FedEx Freight, Inc. Phoenix Service Center. He transferred to Austin area on October 12, 2009, as a Part Time City Driver. He became a Full Time City Driver on October 25, 2009. Specifically, Plaintiff worked at the Austin FedEx Freight Service Center located at 2500 Chisolm Trail, Round Rock, Texas 78681. He identified his residence during that time as 3000 North Lakeline Boulevard, Apt. # 714, Leander, Texas 78641. Plaintiff worked as a City Driver in the Austin area and received and executed all work assignments within Travis and Williamson County, Texas. The documents regarding Plaintiff's employment, including his personnel file, are located in Round Rock, Texas.

EX. A


4. I have reviewed information from the FedEx database for the following current employees who worked with Plaintiff and/or were allegedly involved in the allegations of discrimination and provide their name, title, and city of residence as follows:

Tim Springer, former Operations Supervisor, currently Operations Manager,
Georgetown, Texas
Eric Peterson, former Operations Supervisor/City Dispatcher, currently City
Driver, Liberty Hill, Texas
Irene French, HR Advisor, New Braunfels, Texas

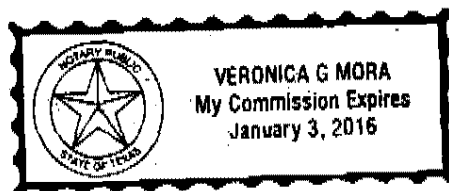
5. In addition, I have reviewed information from the FedEx database for the following individuals who worked with Plaintiff and/or were allegedly involved in the allegations of discrimination but who are no longer employed with FedEx and provide their name, former title with FedEx, and last known city of residence:


Chris Knight, former Operations Manager, New Braunfels, Texas
Chris Wright, former Operations Supervisor/City Dispatcher, Victoria, Texas
Thomas Thornburg, former Operations Supervisor, Georgetown, Texas

6. Further Affiant Sayeth Not.


William McCullough

Sworn to and subscribed before me by William McCullough on 19th day of December, 2014.




Notary Public in and For the
State of Texas